

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**GOD’S LITTLE GIFT, INC. d/b/a
HELIUM & BALLOONS ACROSS
AMERICA (also known as HABAA) and
GARY PAGE,**

Plaintiffs,

v.

AIRGAS, INC.,

Defendant.

Civil Action No: 3:17-cv-04-FDW-DSC

ADDENDUM TO STANDING PROTECTIVE ORDER

This Addendum memorializes the agreement between Plaintiffs and Defendant (each a “Party” and collectively, the “Parties”) regarding confidentiality of discovery in the above-captioned action (the “Action”).

1. This Addendum supplements the Court’s Standing Protective Order for Civil Cases, entered on May 14, 2007. All provisions of the Standing Protective Order are incorporated herein.

2. The Parties acknowledge that discovery in this case could include requests for information regarding highly sensitive proprietary and confidential commercial information, including but not limited to pricing information, terms of commercial agreements, and financial information, that if disclosed to competitors could harm the producing party’s business interests and place the producing party at a competitive disadvantage (“Highly Confidential Information”).

3. The parties therefore stipulate and agree that a party may designate any document or information as “Highly Confidential—Attorney’s Eyes Only” if counsel determines, in good faith, that such document or information contains Highly Confidential Information, and if such designation is necessary to avoid harming the party’s business interests or placing the party as a competitive disadvantage.

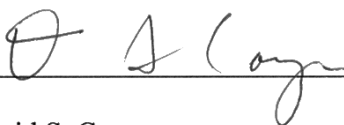
4. Information of documents designated as “Highly Confidential—Attorney’s Eyes Only” shall not be disclosed to any person, except:

- a. Counsel for the requesting party;
- b. Employees of such counsel assigned to and necessary to assist in the litigation;
- c. Specially retained consultants or experts to the extent deemed necessary by counsel, provided however, that the consultant or expert is not employed by and does not provide services for any company that is a competitor of Plaintiffs or Defendant;
- d. Any person who was an original author and/or recipient of the document or information; and
- e. The Court or the jury at trial or as exhibits to motions.

5. For avoidance of doubt, Paragraphs 2-3 and 5-9 of the Standing Protective Order apply to information designated as “Highly Confidential—Attorney’s Eyes Only.”

SO ORDERED.

Signed: February 21, 2017



David S. Cayer
United States Magistrate Judge



Dated: February 21, 2017

Respectfully submitted,

/s/ Donald M. Brown, Jr. (w/permission)

Donald M. Brown, Jr.
N.C. Bar No. 14178
brownattycalendar@gmail.com

BROWN & ASSOCIATES, PLLC
Park South Professional Center
10440 Park Road, Suite 200
Charlotte, NC 28210
Telephone: (704) 542-2525
Facsimile: (704) 541-4751

Attorney for Plaintiffs

/s/ Gregory L. Skidmore

David C. Wright III
N.C. Bar No. 11161
dwright@robinsonbradshaw.com
Gregory L. Skidmore
N.C. Bar No. 35571
gskidmore@robinsonbrashaw.com

ROBINSON BRADSHAW & HINSON, P.A.
101 North Tryon Street, Suite 1900
Charlotte, North Carolina 28246
Telephone: (704) 377-2536
Facsimile: (704) 378-4000

Attorneys for Defendant Airgas, Inc.